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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 VANESSA WUTHRICH,) Case No.: 2:21-cv-00160-JCM-VCF
17 vs.)
18 INTELIDENT SOLUTIONS, LLC, a)
19 Foreign Corporation, COAST DENTAL)
20 SERVICES, LLC, a Foreign Corporation;)
21 COAST DENTAL OF NEVADA, INC.,)
22 a Domestic Corporation; KATHERINE)
23 BALMER, an individual; and DOES I-X,)
24 and ROE CORPORATIONS I-X,)
25 Defendants.)
26

27 **STIPULATION AND ORDER TO
28 EXTEND SCHEDULING ORDER
29 DEADLINES**

30 **(Ninth Request)**

31 The parties, by and through their respective counsel, hereby stipulate to extend
32 the Scheduling Order deadlines in this case as follows:

33 Discovery Deadline	34 December 8, 2023
35 Dispositive Motion Deadline	36 January 8, 2023 ⁴
37 Joint Pretrial Order	38 February 7, 2024, or 30 days 39 from the ruling on a 40 dispositive motion

41 This is the ninth request for an extension of these deadlines. The parties provide
42 the following information regarding the proposed extension of the discovery deadline:

Discovery Completed to Date

2 The parties have served their Initial Disclosures. Defendants have served
3 interrogatories and requests for production, and Plaintiff has responded. Plaintiff has
4 served seven sets of interrogatories and requests for production, and Defendants have
5 responded, although there are meet and confer issues concerning the discovery
6 responses on both sides. Plaintiff's deposition was originally planned for April 27,
7 2022, but needed to be rescheduled for reasons outlined in previous submissions.
8 Plaintiff's deposition and two other key depositions were then scheduled for September
9 7, 9 and 13, but had to be postponed due to the recent developments set forth below.
10

Remaining Discovery to Be Completed

13 Depositions of Plaintiff, Defendant Balmer, Rule 30(b)(6) deponents and other
14 current and former employees of Coast Dental, and related written discovery.

Reasons Discovery Could Not Be Completed Within the Existing Deadline

16 The parties have acted in good faith in attempting to comply with discovery
17 deadlines. The Court signed a scheduling order extending deadlines until August 10,
18 2023. A corresponding order was entered on April 24, 2023. The parties agreed to the
19 stipulation after counsel for Plaintiff underwent surgery and experienced post-operative
20 complications. In late May 2023, counsel for Defendant experienced emergent health
21 issues, which required hospitalization. Also, due to staffing issues, it has taken longer
22 than anticipated to assign this matter to another attorney while defense counsel
23 continues rehabilitation. Therefore, the parties have agreed to extend the remaining
24 deadlines to ensure adequate time to conduct depositions and review propounded
25 discovery after the deposition prior to the deadline for dispositive motions.
26 Accordingly, the parties respectfully request deadlines be extended for a period of 120
27 days as noted below.

Proposed Dates for Completion of Discovery

The parties believe they will be able to complete discovery by the proposed new date of December 8, 2023.

Dated this 17th day of July, 2023.

FISHER & PHILLIPS

KEMP & KEMP

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IT IS SO ORDERED:

Carl Becker

UNITED STATES MAGISTRATE JUDGE

DATED: 7-19-2023

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